Wastewater Management Excerpts from EMDF Proposed Plan (September 2018)

1. Section **Design and Construction**, p. 9. The text states:
   "Plans for the four onsite disposal locations provide disposal capacities up to 2.8 million cubic yards… Other elements are necessary support facilities (e.g., a landfill wastewater [water that comes in contact with waste] treatment system, for more information on wastewater see the section on "Wastewater Management")."

2. Section **Design and Construction**, p. 9. The text states:
   "The EMDF would be constructed in phases, only building the projected capacity needed at that time. The wastewater treatment system and the infrastructure for each proposed landfill location would be constructed in the first phase."

3. Section **Operation**, p. 13. The text states:
   "The Central Bear Creek Valley …would require new support systems (meaning all structures outside the landfill that support its operation such as wastewater management ponds, offices, utilities, roads).

4. Section **Wastewater Management**, p. 13. The text states:
   "The operation of the onsite disposal alternative at the Central Bear Creek Valley Site 7c will generate wastewaters in the form of leachate and other landfill wastewater (waters that come into contact with the waste) that will likely require treatment prior discharge into surface water."

   "Management of these wastewaters is a component of this remedial action and, therefore, must be protective of human health and the environment and comply with ARAR requirements, consistent with the FFA, CERCLA, and the NCP."

   "Landfill wastewater from EMDF would be staged and sampled. If sampling results indicate that water quality complies with the RAOs and ARARs (e.g., CERCLA discharge limits) to be agreed to by EPA, DOE, and TDEC, then the water would be directly discharged without treatment to Bear Creek. If the sampling results indicate the water quality is unacceptable for discharge, then the staged water would be treated prior to release. As part of the remedy, a treatment system would be provided adjacent to the EMDF facility. The system would be sized to accommodate the estimated wastewater volume to be treated and designed to remove contaminants projected to exceed discharge limits."

   "The Administrative Record for the management and discharge of this wastewater is not yet complete, and the evaluation of alternatives to address wastewater management in a D2 Focused Feasibility Study is currently under dispute between the Agencies. The ROD will describe CERCLA and NCP-compliant discharge requirements for wastewaters from the EMDF."

5. Section **LONG-TERM EFFECTIVENESS AND PERMANENCE**, p. 19. The text states:
   "During operation when landfill wastewater is generated, that wastewater would be treated as required for removal of contaminants above discharge limits. Upon closure, when the landfill cover is placed, landfill wastewater generation would cease."

6. Section **REDUCTION OF TOXICITY, MOBILITY, OR VOLUME THROUGH TREATMENT**, p. 19. The text states:

> "Onsite Disposal Alternatives would provide landfill wastewater treatment needed to meet ARARs, including portions of the Clean Water Act that address hazardous chemicals. That treatment would reduce contaminants to levels required for discharge."

7. Section **STATE ACCEPTANCE** (Issue 7), p. 23. The text states:

> "Discharge limits – Consistent with the Dispute Resolution Agreement, it is the State's position that discharge limits for disposal of facility wastewater should be consistent with CERCLA and established in the ROD. The State considers it important for a future onsite disposal facility to protect downstream surface water users who eat fish and comply with the Tennessee Water Quality Control Act and regulations."

8. Appendix A:
   - "Landfill wastewater treatment would reduce contaminants to levels required for discharge."
   - "The amounts of hazardous and radioactive constituents that DOE may discharge into Bear Creek will be consistent with CERCLA and agreed to in the ROD"